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May 15, 2018

**VIA ECF & FAX**

The Honorable Judge Debra Freeman  
United States Magistrate Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**Re: *United States v. Keith Orlean*, 18 MAG 3754**

**REQUEST TO MODIFY CONDITION OF RELEASE**

Dear Judge Freeman:

This law firm represents Defendant Keith Orlean in the above-referenced criminal matter.

We write to the Court to respectfully request a modification of a condition of Mr. Orlean's release. Mr. Orlean appeared at the initial appearance in this matter on May 3, 2018 and was released on the conditions which included, *inter alia*, a \$350,000 personal recognizance bond co-signed by three Financially Responsible Persons (FRPs).

We respectfully request a modification of the release condition to require two co-signers of the personal recognizance bond. **We have spoken with Assistant United States Attorney Andrew Thomas and the Government consents to this request.**

Thank you for the Court's consideration.

Very truly yours,

GOTTLIEB & JANEY LLP

A handwritten signature in dark ink, appearing to read 'Robert C. Gottlieb', written over the printed name.

Robert C. Gottlieb

cc: Andrew Thomas, A.U.S.A.